

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

Chapter 11

FIELDWOOD ENERGY LLC., *et al.*,

Case No. 20-33948 (MI)

Debtors.<sup>1</sup>

(Jointly Administered)

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**JOINDER OF NORTH AMERICAN SPECIALTY INSURANCE  
COMPANY IN OBJECTION TO DEBTORS' SECOND MOTION TO  
EXTEND THE EXCLUSIVE PERIODS PURSUANT TO SECTION 1121(d)**

North American Specialty Insurance ("NAS") joins in the following objections: *Objection of XTO Offshore, Inc., HHE Energy Company, and XH LLC to Debtors' Second Motion for Entry of an Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code* [Docket No. 1091] and *Objection of ENI Petroleum US LLC and ENI US Operating Co., Inc. to Debtors' Second Motion for Entry of An Order Further Extending Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code* [Docket No. 1093].

For the reasons set forth in the objections set forth above, which NAS joins in and adopts, the Debtors' motion should be denied.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Respectfully submitted,

/s/ T. Scott Leo

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of March, 2021, a true and correct copy of the foregoing Joinder was served via the Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned case.

/s/ T. Scott Leo